



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE  
CIVIL RIGHTS BUREAU

January 18, 2023

**By Electronic Filing**

Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

**Re:** *In re: New York City Policing During Summer 2020 Demonstrations,*  
*No. 20-CV-8924*  
This Letter is Related to All Cases

Dear Judge Gorenstein:

I am counsel for the People of the State of New York and write on behalf of the consolidated plaintiffs to oppose Defendants' request for an extension to respond to Plaintiffs' request for a date certain by which to produce promised disciplinary records. ECF Nos. 814, 816.

Plaintiffs' request is not premature. Plaintiffs made clear that they considered the parties at an impasse if Defendants could not commit by January 6 to a specified production schedule. When Defendants promised a response the following week, Plaintiffs did not immediately file their letter request but also did *not* consent to any extension. In any event, Defendants failed to provide any update and still appear to be unprepared to do so, seeking yet another two weeks simply to provide a production date.

Defendants should not be allowed to drag out this production any longer. Productions that should have, by Defendants' own representation, started November 4 have been delayed over two months. Plaintiffs respectfully ask that the Court deny the extension request and require Defendants to respond in short order so that the Court can set a production date.

Respectfully submitted,

s/ Lillian Marquez

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CC: All counsel of record